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supra. Salutory legislation would therefore be defeated in many cases, and so it is submitted that possible regulation should only be a circumstance in determining whether the legislature acted reasonably.

CONTEMPT OF COURT — CONSTRUCTIVE CONTEMPT — BRINGING PRESSURE TO BEAR ON ATTORNEY. — In a suit for divorce, the plaintiff's father wrote a letter to the defendant urging him to withdraw his defense, and he personally threatened to bring political pressure to bear on defendant's attorney provided he did not withdraw from the case. *Held*, that these acts constituted contempt of court. *In re Bowers*, 104 Atl. 106 (N. J.).

The commonest kind of contempt occurring outside the court room is that which impedes the court in reaching a result in accord with the rules and principles of law. Thus publication of proceedings may so arouse the community, including witnesses, counsel, and jurors, as to make calm judgment difficult. *Globe Newspaper Co. v. Commonwealth*, 188 Mass. 449, 74 N. E. 682. See 28 HARV. L. REV. 605. This may be the effect, even though the matter published be true; hence truth is no defense. *Hughes v. Territory*, 10 Ariz. 119, 85 Pac. 1058; *People v. News-Times Pub. Co.*, 35 Colo. 253, 84 Pac. 912. But truth may be considered in mitigation of punishment. *Globe Newspaper Co. v. Commonwealth*, *supra*. Within the same principle comes arrest of witness. *Smith v. Jones*, 76 Me. 138. Also writing letters to influence witness. *Welby v. Still*, 66 L. T. Rep. (N. S.) 523. Assault on a witness who has testified would seem to be contempt, since general security of witnesses, after as well as during the trial, is essential to freedom in testifying. *Brannon v. Commonwealth*, 262 Ky. 350, 172 S. W. 703. So concealing or tampering with evidence. *Commonwealth v. Braynard*, Thach. Crim. Cas. (Mass.) 146. The principal case is a new and novel example of this sort of contempt of court. To force an attorney to withdraw from a cause would deprive the court as well as the party of the services of an officer, and would obviously tend to an incomplete presentation of the case for one of the parties. This would obstruct the court in applying accurately its rules and principles. For a general discussion of the subject, see Beale, "Contempt of Court, Criminal and Civil," 21 HARV. L. REV. 161.

DEEDS — CONSTRUCTION AND OPERATION — LAKE AS A BOUNDARY. — A conveyed land to B. The deed described a boundary as "along said road and lake." The road bordered on the lake, which was not navigable. *Held*, the deed conveys title to the land under the lake to the center thereof. *Land & Lake Association v. Conklin*, 170 N. Y. Supp. 427 (App. Div.).

If the fee in a highway is in the abutting owners subject to a public easement, a conveyance describing land as "along said road" *prima facie* conveys to the center thereof. *Peck v. Denniston*, 121 Mass. 17; *Columbus Ry. Co. v. Witherow*, 82 Ala. 190, 3 So. 23. Cf. *Thomas v. Hunt*, 134 Mo. 392, 35 S. W. 581; *In re Ladue*, 118 N. Y. 213, 23 N. E. 465. A deed of land "along a lake" conveys, *prima facie*, the bed thereof as far as the grantor owns. *Gouverneur v. National Ice Co.*, 134 N. Y. 355, 31 N. E. 865; *Lembeck v. Nye*, 47 Ohio St. 336. Cf. *Brophy v. Richeson*, 137 Ind. 114, 36 N. E. 424. Literal construction, therefore, of a deed "along said road and lake" is impossible. But construing it against the grantor, as is the rule, the deed would be interpreted as if it read "along said lake." *Lake Erie & W. R. Co. v. Whitham*, 155 Ill. 514, 40 N. E. 1014. Thus the question is raised as to how far titles of owners of land bordering on lakes extend. In some jurisdictions the state holds the title to lake beds so that the public may enjoy the boating and fishing. *Wright v. Council Bluffs*, 130 Iowa, 274, 104 N. W. 492; *Dolbeer v. Suncook, etc. Co.*, 72 N. H. 562, 58 Atl. 504. Cf. *Paine v. Woods*, 108 Mass. 160. In some, riparian owners hold title to the beds. *Glasscock v. National Box Co.*, 104 Ark. 154, 148 S. W.